

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: MARIO D. CAROSI and LEONITA A. CAROSI, Debtors.	Chapter 13 Case No. 14-11946-DF
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**RESPONSE TO DEBTORS' MOTION TO DETERMINE PROPRIETY OF
POSTPETITION MORTGAGE FEES, EXPENSES, AND CHARGES
FILED BY US BANK TRUST, N.A.**

NOW COMES U.S. Bank Trust National Association, as Trustee of the Bungalow Series III Trust as serviced by BSI Financial Services ("**U.S. Bank Trust**"), and respectfully responds to the Debtors' Motion to Determine Propriety of Postpetition Mortgage Fees, Expenses, and Charges filed by U.S. Bank Trust, N.A. (the "**Motion**") as follows:

1. On July 18, 2019 and November 5, 2019 U.S. Bank Trust incurred tax advances in the amounts of \$1,995.60 and \$3,991.20.
2. On December 4, 2019, counsel for U.S. Bank Trust filed a Notice of Postpetition Mortgage Fees, Expenses, and Charges which included the two tax advances mentioned above.
3. On or about December 20, 2019, the Debtors filed their Motion, asking the court to determine the above referenced charges as improper.
4. Upon receiving service of the Motion, BSI Financial Services conducted a review of the loan and has since determined that it has in fact received two (2) checks

from the Burrillville tax collector in the same amounts as the advances stated above.

5. U.S. Bank Trust is in the process of amending it's postpetition fee notice and anticipates filing such shortly. The amended notice will not have the two tax disbursements listed as recoverable from the Debtors.

WHEREFORE, U.S. Bank Trust respectfully requests that this Honorable Court

1. Grant such relief as deemed just and proper.

Respectfully submitted,

U.S. BANK TRUST NATIONAL
ASSOCIATION, AS TRUSTEE OF THE
BUNGALOW SERIES III TRUST AS
SERVICED BY BSI FINANCIAL SERVICES,

/s/ Michael E. Swain, Esq.

Michael E. Swain, Esq. (BBO#8190)

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DATE: December 30, 2019

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CERTIFICATE OF SERVICE

I, Michael Swain, Esq. of the law firm of Demerle Hoeger, LLP, hereby certify that I have this 30th day of December 2019 served on behalf of U.S. Bank Trust National Association, as Trustee of the Bungalow Series III Trust as serviced by BSI Financial Services, a Response to Debtors' Motion to Determine and this Certificate of Service by causing copies hereof to be sent by electronic mail via the Case Management / Electronic Case Files (ECF) system and by first-class U.S. mail (M) to all parties not appearing electronically but entitled to service per the Federal Rules of Bankruptcy Procedure.

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/s/ Michael E. Swain, Esq.
Michael E. Swain, Esq.